

UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD

IPR2014-00580 and 726  
Patent 6,896,773

**PATENT OWNER ZOND LLC'S  
DEMONSTRATIVE EXHIBIT**

## OBVIOUSNESS

Claims 1-20 and 34-40 Are Not Obvious Over Mozgrin  
and Fortov

❖ Mozgrin and Fortov would not have taught:

“an ionization source that generates a weakly-ionized plasma from a feed gas proximate to the anode and the cathode assembly,” as recited in independent claim 1 and as similarly recited in independent claim 34

## OBVIOUSNESS

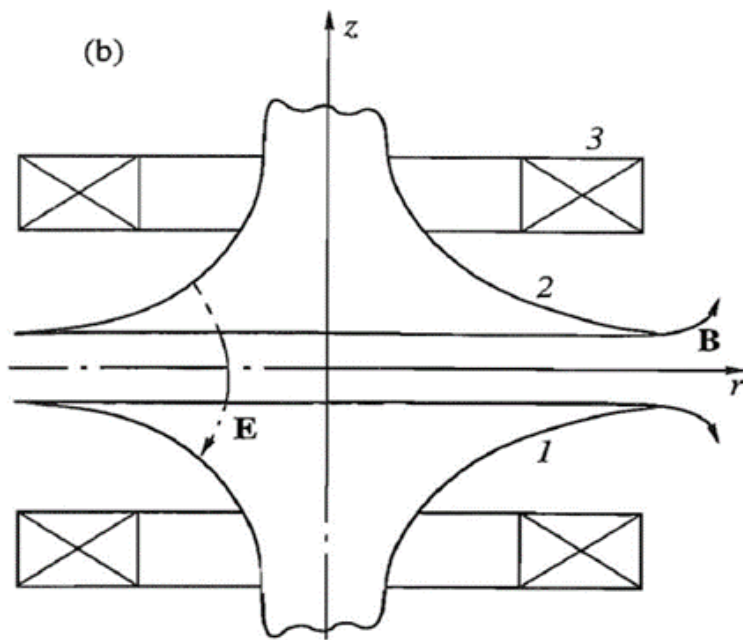
### Claims 1-20 and 34-40 Are Not Obvious Over Mozgrin and Fortov

- ❖ Petitioners relied on Mozgrin alone for this limitation. Mozgrin does not teach a weakly ionized plasma proximate to both the anode and the cathode asser

“For pre-ionization, we used a stationary magnetron discharge; the discharge current ranged up to 300 mA. We measured the discharge current-voltage characteristics in a  $10^{-3}$  – 10 torr pressure range and plasma parameters at the discharge ***at the symmetry center of the shaped-electrode system*** using a probe technique. We found that only the regime with magnetic field strength not less than 400 G provided the initial plasma density in the  $10^{10}$  –  $10^{11}$  cm<sup>-3</sup> range (Mozgrin at 401, right col, ¶ 2 (emphasis added)).

## OBVIOUSNESS

Claims 1-20 and 34-40 Are Not Obvious Over Moz  
and Fortov



## OBVIOUSNESS

### Claims 1-20 and 34-40 Are Not Obvious Over Mozgrin and Fortov

- ❖ Mozgrin does not teach a weakly ionized plasma proximate to both the anode and the cathode asser

As shown by Fig. 1(b) on the previous slide, the axis of symmetry (i.e., the place where Mozgrin measured the density of the plasma) is as far away from both the cathode (1) and anode (2) as it possibly can be while still being between the cathode and anode.

only the area at the perimeters of the anode and cathode along the r-axis of Fig. 1(b) reproduced above (i.e., high positive and negative values of  $r$  at  $z = 0$ ) are close to both the anode and cathode. That is, the only area that is close to both the anode and cathode is not the area where Mozgrin measured the density of the plasma.

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